

# PROPOSAL EVALUATION

## Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

**PIN:** 6016  
**APPLICANT NAME:** City of Stockton  
**PROJECT TITLE:** Delta Water Supply

**FUNDS REQUESTED:** \$ 50,000,000  
**COST MATCH:** \$122,000,000  
**TOTAL PROJECT COST:** \$172,000,000

**DESCRIPTION:** San Joaquin River Delta at the southwestern tip of Empire Tract and the San Joaquin River, a raw water pump station and pipeline, a water treatment plant, and potable water pumping and transmission facilities. Proposition 50 funding is sought for the first phase of the DWSP which includes the necessary facilities for a potable water supply capacity of 30 million gallons per day.

**Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.**

Pass

**Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1.** 2

The applicant is a member agency of the Northeastern San Joaquin County Groundwater Banking Authority (GBA) which is engaged in the development of an IRWMP. The applicant provided a schedule showing that the IRWMP would be adopted by the end of 2006.

**Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1.** 4

The region is appropriate for regional water management. The context and character of the region is described well and provides sufficient background to understand the level of planning to date, specific difficulties and conflicts, and water supply, demands, and operational conditions and facilities. According to the IRWMP, "over appropriation, overdraft and location...produce complex issues (in Region)." Addressing these issues requires support and participation of stakeholders throughout San Joaquin County and the region. The purveyor supplies, regional water balance, and urban demands are fairly well detailed, but it is difficult to determine how they are related.

**Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1.** 3

The objective statement for the IRWMP was adopted by the GBA. There is only one objective. However, it has four elements that address: 1) regional economy, 2) lifestyle protection, 3) water use efficiency, and 4) water rights. The IRWMP will addresses growth, competing demand, management structure, the delta, limited surface water sources, overdraft, saline intrusion, and flood protection issues. The application does not fully address conflicts in the delta and has insufficient documentation of how the IRWMP objective was derived. The conflict of pumping more water from the delta system for an agency's supply to offset groundwater pumping is neither discussed as controversial nor explained in its regional context.

**Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1.** 3

The water management strategies to be addressed in the final IRWMP are listed. The methodology used to arrive at the list is not described, nor is there any discussion of the strategies not considered as applicable. Practical limits of the GBA management are cited as a limiting factor for the set of items included. The benefits listed which would be due to integration of the strategies addressed are said to be increased stakeholder support and identification of additional sources of funding.

**Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.** 2

Short- and long-term projects are not distinguished in the project details in the application, but some scheduling information is provided. Each of the projects is not detailed to the same level and some of the projects have only a single paragraph describing the strategy. A long list of those invited for participation in facilitated public GBA meetings is provided along with the participants. Stakeholder involvement in the public GBA meetings is facilitated by utilizing a mutual interest-based governance framework to gain consensus and make forward progress with plan implementation. The schedule aspect of the IRWMP consists of only a few milestones accomplished or expected and is not well described. The priorities have been described, but have yet to be adopted as final, making evaluation difficult.

# PROPOSAL EVALUATION

## Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

### Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

2

The applicant does state that they anticipate some preliminary study work to be necessary for implementation. However, due to the unfinished nature of the IRWMP it does not seem to form a sufficient basis for the selection of the project plans. It appears as though the programs and projects listed are already being implemented and the only way they are tied to the IRWMP is through tables associating the water management strategies to be addressed in the IRWMP. Perhaps the projects do meet regional needs and that parallel efforts will coalesce under the final IRWMP to generate the benefits of integration cited by the applicant, but the only linkages demonstrated in the narratives are for project groups meeting multiple water management strategies.

### Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

2

The applicant has yet to finalize and adopt IRWMP Element 2, Programmatic EIR, so what was submitted is a description of what will be done, making evaluation difficult. The impacts of many of the projects, that are included in the proposal, lack detail regarding plan implementation and interregional impacts and benefits. No discussion on DACs could be found in the IRWMP.

### Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

4

The applicant provides tables of well water levels over time and discusses data, technical methods, and analyses used in the selection of water management strategies. A feasibility study is cited in the application but not included with the application. For assessing performance, the applicant would implement current industry standard models to screen and evaluate scenarios for further development. In addition, stakeholder coordination meetings would be used to garner input on models outputs and other analyses. The GBA meetings would facilitate the process to incorporate any relevant revelations regarding interim process issues or outcomes. The discussion on data gaps only mentions that they will be identified in the final IRWMP.

### Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

4

The data management and dissemination methodology would be handled by a Basin Operations Support System, which is a GIS based system currently in development. The discussion of existing data and monitoring networks is focused on the San Joaquin County Flood Control and Water Conservation District groundwater monitoring program, and no mention of the SWAMP and GAMA could be found in the IRWMP.

### Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

2

The finance plan has not been developed, but is an element of the Management Action Plan section of the IRWMP. The applicant merely states "Implementation of IRWMP will require some agreements between GBA and other water management entities within the GBA service area about how to finance the projects and management actions..." O&M figures are only provided for two of the projects listed in the IRWMP.

### Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

2

The application identifies potential solution and benefits areas in addition to the IRWMP region and delineates coordination between scales as inter and intra-regional needs. As the IRWMP is only a draft it does not detail the means of coordination with local authorities or how the strategies would integrate or conflict with local plans. Local planning documents would be used to help form the IRWMP; the applicant mentions the IRWMP will build upon past efforts by integrating, prioritizing and evaluating projects and actions proposed by various plans. The applicant was not clear as to whether the information will be used to develop regional water management strategies that address the needs of all the local agencies within the region.

### Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

4

The GBA forum would serve as the primary vehicle to incorporate stakeholder input and coordinate information and activities during IRWMP development. Specific stakeholders have been invited to participate. In addition, lists of current participants in GBA activity and the invitation mailing list is provided. Environmental justice concerns and DAC's are not specifically addressed, but the applicant states that there are no DAC's in the IRWMP region. The final IRWMP should identify State and federal permits or other actions that would likely be required for most any implementation construction activity.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Pass

# PROPOSAL EVALUATION

## Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

### Question: Description of Proposal. Weighting factor is 3.

9

The proposal has only one project and does not appear to be an integrated project, and it only provides limited multiple benefits. The proposed project is the Delta Water Supply Project, with the source of new supply as the Sacramento-San Joaquin River delta and the project includes a target of 30 MGD treated water by 2010. The water rights application for the Delta was submitted to the State Water Board in 1996 for 33,600 AF. An EIR/EIS was published in May 2005. Water Rights Permit 21176 was issued on December 20, 2005 to the City of Stockton for water from the San Joaquin River. The delta is already a heavily impacted source of surface water, and current existing water rights holders/demands cannot be met in most years. Therefore, the project does not appear as though it would increase water supply reliability in the long-term. The scientific basis for the project is questioned, as the application has several conditional statements regarding the current status of the project.

### Question: Project Prioritization. Weighting factor is 2.

6

Criteria for prioritizing projects are discussed in the narrative and some examples given, but the actual final IRWMP is not yet written so no demonstration of the result of the process can be provided. There is some mention of Alternative Screening, Selection, and Prioritization. The applicant states that the proposed project is a high priority project in the IRWMP, but did support it by documentation in the IRWMP.

### Question: Cost Estimate. Weighting factor is 1.

4

Cost estimates assume a mildly conservative inflation rate of 5% and are based on a date of March 2005 through the end of 2008, the midpoint of construction. The grant fund request is for 29% of the total project cost and covers only budget category Construction/Implementation. Land purchase and environmental compliance are considered done and were not included. Due to the lack of technical work done to date, the construction cost of the project cannot be verified as being reasonable.

### Question: Schedule. Weighting factor is 1.

4

Water Rights Permit 21176 was issued on December 20, 2005 to the City of Stockton for water from the San Joaquin River. The schedule is basic and shows the construction contract in mid-2006 through start of operations beginning early 2010.

### Question: Need. Weighting factor is 2.

6

The applicant describes the need for an additional surface water source and a reliable water source as they will have a decrease in surface water supplies that will be available to them in the future. According to the applicant, its has a groundwater yield target of 40 TAF/y, but the current pumping by the applicant is not cited; only regional pumping figures are provided. The proposal would help meet future needs by developing a new, third source of water. If the project is not constructed, conservation and water use efficiency may not be sufficient to compensate for the loss of temporary surface water contracts. The proposal allows the applicant to avoid paying for the cost of groundwater treatment for contaminated supplies that are replaced by surface water.

### Question: Disadvantaged Communities. Weighting factor is 2.

2

Applicant states that the City of Stockton is not a DAC, so this section does not apply to this grant application. No data and analysis was provided which uses the population figures presented, or potential project impacts to DAC groups within the region.

### Question: Program Preferences. Weighting factor is 1.

2

The proposal addresses regional water supply reliability and would measurably contribute to long-term attainment and maintenance of water quality standards, but only for a single city and not for the region or the State. The applicant states that one proposal objective is to improve the regional water supply reliability; this may be true in "wet years", it may not be in other years. In the circumstance that delta water is over allocated, if the proposed project is completed, it may only serve to introduce yet another unreliable water source that a growing population will come to rely on. No mention was made about serving DACs, or reducing pollution in impaired waters and sensitive habitat areas.

**TOTAL SCORE: 67**